

1 Cory R. Narog
2 217 W. Linda Mesa Ave.
3 Danville, CA 94526
4 (925) 230-2345

5 CORY R. NAROG, In Pro Per

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
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11 NAROG, CORY R.,
12 Plaintiff,
13 vs.
14 EQUIFAX, INC.,
15 Defendant
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Case No. **C13-3452**
COMPLAINT

FILED
JUL 25 2013
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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1. **Jurisdiction.** This court holds jurisdiction pursuant 28 U.S.C. § 1331; Federal subject-matter question arising on the face of the complaint.
2. **Venue.** This venue is correct because Plaintiff resides in Contra Costa County, CA and Defendant is a corporation conducting significant business in California and provides an agent for service in Sacramento, CA.

1 3. **Intradistrict assignment.** Oakland/San Francisco is the
2 correct district location because Plaintiff resides in Contra
3 Costa County.

4 4. **Parties in this complaint.**

5 a. **Plaintiff.** Cory R. Narog, 217 W. Linda Mesa Ave. Danville,
6 CA 94526, (925) 230-2345.

7 b. **Defendant.** Equifax, Inc., 1550 Peachtree St. NW H46,
8 Atlanta, GA 60309, (404) 885-8000.

9 5. **Statements of facts and claims.**

10 5a. After Plaintiff discovered inaccurate information
11 reported by Defendant in regards to a Verizon Wireless
12 account, and a subsequent credit report defaming his
13 character, Plaintiff disputed the information online and by
14 phone. Credit reports and dispute results are attached within
15 "**Exhibit A**".

16 5b. However, the inaccurate information was never properly
17 corrected, only changed to different information. Thus,
18 Plaintiff began the process over again in order to clear his
19 name. Unfortunately, Plaintiff began a cycle of disputes with
20 Defendant, each time finding that different, incorrect
21 information was being reported. "**Exhibit A**" contains 11
22 different credit reports and 4 dispute results from Equifax
23 referencing the Verizon Wireless account. Three different
24 results are seen for "date of first delinquency": 2/12, 3/12,
25 26 27 28

1 and N/A. Three different results are seen for "date major
2 delinquency first reported". As the recipient of furnisher's
3 report, Defendant should have this information on file.

4 5c. It becomes especially evident that Defendant has not
5 properly reinvestigated the dispute, as required by Federal
6 Rules of Civil Procedures 15 U.S.C. § 1681e)(b), when noticing
7 both a "date of first delinquency" of 2/12 and a perfect 81-
8 month payment history; not only does the negative account
9 information contradict statements from report to report, but
10 also within individual reports. Attached as "**Exhibit B**", are
11 documents Plaintiff provided to Equifax that supports
12 Plaintiff's dispute of error, such as incorrect opening date,
13 delinquency date, reporting date, high credit, balance,
14 payment history, status, account type, amount past due, and a
15 double charge of activation fees.

16 5d. Defendant repeatedly violated Federal Rules of Civil
17 Procedures 15 U.S.C. § 1681c(a)(6), which states "...no consumer
18 reporting agency may make any consumer report containing...the
19 name, address, and telephone number of any medical information
20 furnisher that has notified the agency of its status..." by
21 reporting information on medical furnishers Neuroscan and John
22 Muir Magnetic Imaging while also stating the account types as
23 "Medical/Health Care".
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1 5e. **"Exhibit A"** reports show 8 inquires have been made where
2 Plaintiff's character have been defamed with inaccurate
3 information.

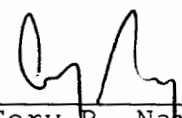
4 5f. Defendant refused to provide Plaintiff with "all" account
5 information on file, including source information, and
6 information on people who procured the reports, pursuant Fed.
7 R. Civ. P. 15 U.S.C. § 1681g, when asked by phone and letter
8 (see **"Exhibit C"**.
9

10 **6. Request for relief.**

11 6a. Defendant has created a financial and mental burden for
12 Plaintiff by repeatedly defaming his character when furnishing
13 inaccurate reports to requestors and failing to comply with
14 FCRA procedures. In fact, Plaintiff was turned down by several
15 property management companies when seeking to rent residences
16 (see **"Exhibit D"**), as a direct result of the libel.
17

18 6b. Plaintiff requests to have the Verizon Wireless and
19 Fresno Credit Bureau accounts deleted or corrected per Fed. R.
20 Civ. P. 15 U.S.C. § 1681i(a)(5)(A), and be awarded \$10,000.00
21 for 10 violations of willful noncompliance, pursuant Fed. R.
22 Civ. P. 15 U.S.C. 15 U.S.C. § 1681n(1)(A).
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25 DATED: July 23, 2013

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